

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**

OLIVIA Y., et. al.,

Plaintiffs,

v.

**PHIL BRYANT, as Governor of the
State of Mississippi**

Defendants.

C.A. 3:04CV251LB

**MOTION FOR WITHDRAWAL OF APPEARANCES OF
JULIA L. DAVIS AND KATHRYN A. WOOD**

Pursuant to Local Uniform Civil Rule 83.1, Plaintiffs' counsel hereby request that Julia L. Davis and Kathryn A. Wood be allowed to withdraw as counsel for Plaintiffs in the above-captioned case. Plaintiffs have other, able counsel of record in this matter who will continue to represent their interests and there will be no inconvenience to the Court as a result of this withdrawal. In particular, attorney Marcia Robinson Lowry, who left Children's Rights on August 15, 2014 and began working as an independent counsel on that date, will continue as lead counsel for Plaintiffs herein. Ms. Lowry has over 30 years of experience in class action child welfare reform cases and has represented the plaintiffs in this matter since 2004. She will continue to fairly and adequately protect the interests of the class in accordance with Fed. R. Civ. P. 23.

There are no actions requiring the participation of Julia L. Davis and Kathryn A. Wood and said attorneys can withdraw without a material adverse effect on the interests of Plaintiffs.

Notice of the intention of Julia L. Davis and Kathryn A. Wood to withdraw from this case is being provided to counsel for all other parties in this case. Julia L. Davis has consulted

with the remaining Named Plaintiff himself who is eighteen years of age and who consents to the withdrawal of Julia L. Davis and Kathryn A. Wood. Julia L. Davis has attempted to contact Zelatra Williams, the Next Friend for the remaining Named Plaintiff in this case to obtain consent for the withdrawals but has been unsuccessful in locating her.

A proposed Order accompanies this motion.

RESPECTFULLY SUBMITTED, this 16th day of September, 2014

/s/ W. Wayne Drinkwater, Jr.

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PLAINTIFFS' COUNSEL

CERTIFICATE OF SERVICE

I hereby certify that on September 16th, 2014, I electronically filed the foregoing Motion for Withdrawal of Appearances of Julia L. Davis and Kathryn A. Wood with the Court using the ECF system, which sent notification of such filing to the following:

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